

**2016 Mission Division Audit Findings and Responses**

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV PG&E's Internal Review Findings	1	<p>At the start of the inspection, PG&amp;E provided SED its findings from the internal review it conducted of the Division. Some of PG&amp;E's internal review findings are violations of PG&amp;E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.605(a). SED is aware that PG&amp;E corrected some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&amp;E's internal review.</p> <p>Please provide SED an update on the items that were still pending corrective actions as of July 15, 2016.</p>	<p>Per the attached summary of PG&amp;E's Mission Internal Review, there were 2 findings, which has been highlighted in yellow, that were awaiting resolution. The requested updates to these findings have been provided on the Internal Review. Attached, please find attachment 1 - "Mission Internal Review" and associated attachments.</p>	<p>Atch 1_ Mission Internal Review.docx Atch 2_Sheridan Rd. Ops Diagram 0804585_CONF.pdf Atch 3_Sheridan Rd. Reg Station Data Sheet_CONF.pdf Atch 4_Tupelo St. Ops Diagram 0804598_CONF.pdf Atch 5_Tupelo St. Reg Station Data Sheet_CONF.pdf Atch 6_Order 31261918_CONF.pdf</p>
NOV	2	<p>Title 49 CFR §192.605(a) states:</p> <p>"General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."</p> <p>PG&amp;E's standard TD-4540S "Gas Pressure Regulation Maintenance Requirements" Rev-0 dated 10/16/2013, "Table 2. Maintenance Schedule" showed Class A or B inspections for Large Volume Customer Regulator Station are required to be performed once each calendar year, at intervals not to exceed 15 months.</p> <p>The last maintenance for Large Volume Customer regulator L-076 was performed by PG&amp;E on 2/14/2013.</p> <p>Therefore, PG&amp;E is in violation of 192.605 (a) for failing to perform maintenance on this regulation station during the 2014 and 2015 calendar years as required by its procedure.</p>	<p>The meter set regulator for the Large Volume Customer (LVC), Mission Valley Asphalt, Gas Facility Maintenance (FM) No. L-076, has had a Request for Work (RW) generated to change the maintenance cycle in SAP from a 5 year maintenance plan to annual. Attached, please find attachment 7 - "RW 111970436".</p> <p>As part of the new Transmission definition rollout, the GIS team is conducting an analysis of system wide LVC's and any connected primary sets to ensure the assets are captured in SAP. The SAP work management team is also involved to ensure appropriate maintenance schedules are being programmed for LVC meter sets. If a local Division determines that they have a meter set feeding an LVC, then the maintenance frequency will be changed to annual.</p>	<p>Atch 7_RW 111970436_CONF.pdf</p>
AOC	1	<p>During SED's field observation, lockup could not be achieved either at the working or monitoring regulators at four of the five stations SED visited (RL-22, RL-32, RS-07, &amp; RF-02).</p> <p>The previous year's annual maintenance records noted the same recurring issue at the aforementioned regulators, in addition to others. Sulfur build up at the main body diaphragm or pilot stem was recorded as the main cause and also observed during SED's field visit.</p> <p>SED also observed these problems in other divisions and discussed the concern during the 2014 SED inspections in Sonoma and Humboldt Divisions; hence, this shows the problem may be system wide.</p> <p>Therefore, please provide responses to the following:</p> <p>a. What is PG&amp;E's plan to mitigate this recurring issue at the division, and also system wide? b. Considering this issue was observed in several divisions, has PG&amp;E tried to address this in its DIMP program? If no, please explain why. c. SED observed "Sulfur Filters" installed at some stations to reduce the sulfur build up in the equipment. Does PG&amp;E take similar action at stations where similar problems were observed?</p>	<p>a. PG&amp;E plans to install sulfur filters at the 4 locations in the Mission Division (RL-22, RL-32, RS-07, &amp; RF-02) where lockup could not be achieved as required per procedure TD-4540P-01. Attached, please find attachment 8 - "TD-4540P-01." This procedure is applicable system wide. Section 2.8 and Section 3.6.3 describe the requirements if sulfur is present on station internal components. The tasks include documenting sulfur presence on the maintenance record, cleaning or replacement of affected components, notification to the senior gas quality engineer, and creation of a corrective notification to install sulfur filters if the station contains pilot operated equipment. Corrective notifications 111992959, 111992960, 111992961 and 111992961 were generated as required to install the filters at the 4 locations in the Mission Division. Installation of the filters is estimated for completion by the 4th quarter of 2017.</p> <p>b. DIMP observed reports of sulfur build up at regulator stations from field reviews and identified this as a potential threat. DIMP reviewed this potential threat and is working with the Overpressure Elimination Team to develop mitigations beyond the mitigations required in TD-4540P-01, which require maintenance personnel to install sulfur filters on pilots when sulfur is identified.</p> <p>c. As stated in response a) above, the requirements to install sulfur filters per procedure TD-4540P-01 are applicable system wide.</p>	<p>Atch 8_TD 4540P-01.pdf</p>
AOC	2	<p>Title 49 CFR §192.467 External corrosion control: Electrical isolation, states,</p> <p>"(a) Each buried or submerged pipeline must be electrically isolated from other underground metallic structures, unless the pipeline and the other structures are electrically interconnected and cathodically protected as a single unit.</p> <p>(b) One or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control"</p> <p>During SED's field inspection of regulator station RF-02, SED observed no insulation between the steel pipeline and metal support.</p> <p>Please provide PG&amp;E's plan to address this concern.</p>	<p>Insulation was installed between the steel pipeline and metal support at regulator station RF-02 on July 18, 2016. Attached, please find attachment 9 - "Pipe Support 1" and attachment 10 - "Pipe Support 2" showing photographs of the newly installed insulation.</p>	<p>Atch 9_Pipe Support 1.jpg Atch 10_Pipe Support 2.jpg</p>

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AOC	3	<p>3. During SED's field inspection of regulator station RL-20, SED noticed that the regulator and monitor manholes were approximately 9 feet deep with no confirmation of enough air movement for employees to work safely inside. PG&amp;E's technicians stated that they used an external air mover to introduce outside air while working inside.</p> <p>SED recommends PG&amp;E to perform a study to determine if these air movers provide an adequate amount of ventilation for personnel while performing work inside these or similarly designed manholes, and to make adjustments as needed.</p>	<p>On 8/9/2016 a meeting was held with the crew and it was confirmed that there are no safety concerns regarding sufficient air movement for employees to work safely inside the manholes. The Crew stated that they followed standard practice and ran an Air Mover when in the man-hole, while an Air Monitor was also being used prior to entry and while performing the work. The Air Monitor is used to alert users when CO2 (Carbon Dioxide) is high, Oxygen is high or low, H2S (Sulfur Gas) is high, and/or Methane is high. The Air Monitor has historically not detected a hazardous atmosphere at this location.</p>	
AOC	4	<p>PG&amp;E Utility Work Procedure TD-4540P-01 states:</p> <p>"Review data sheets during each inspection AND update as needed"</p> <p>SED observed the following incomplete documentation or the use of outdated forms. SED recommends updating these as needed.</p> <p>I) PG&amp;E used outdated maintenance forms for Meter Set Assembly (MSA) maintenance. PG&amp;E developed form F4340P-02-F02 Rev-1 published on 02/14, but documented the following maintenance on the old version of the forms.</p> <ul style="list-style-type: none"> <li>a. The 6/3/15 maintenance of MSA F-630</li> <li>b. The 8/4/14 maintenance of MSA L-449</li> <li>c. The 2/19/15 maintenance of MSA H-159</li> </ul> <p>II) Working monitor set points were not recorded on the "Regulator Station Datasheet TD-4540-01-F01" for regulator stations RL-36, RL-39, &amp; RL-40. SED also observed similar circumstances during inspections at other divisions.</p> <p>PG&amp;E explained that the set points can be found on the brass plate tag located on each piece of equipment. SED observed the presence of these tags at the above regulator stations; however, similar to the other set points recorded in the datasheet, SED recommends recording the working monitor set points on the datasheet to ensure full documentation of records for review.</p> <p>III) PG&amp;E's form TD-4540-01-F02 "Regulator Station Maintenance Record" does not include a section for employees to record issues related to "Working Monitor Lockup". For instance, the working monitor did not lockup during the 8-25-15 annual maintenance of regulation station RF-02, but the issue wasn't recorded on the above form, except for the technician's note on the back side of the form.</p> <p>SED recommends revising the form to give employees an opportunity to record issues like the one noted above.</p>	<p>I) The Meter Set Maintenance Records for the 3 customers noted have been recorded on form TD-4540P-02-F02 Rev-1 published on 02/14. Attached please find attachment 11 - "Meter Records".</p> <p>II) PG&amp;E recommends recording the working monitor set point in the "Monitor" set point field of the Regulator Station Datasheet TD-4540-01-F01. For example, if the monitor is set to 57psig and the working monitor is set to 200 psig, then you would enter "57/200" in the monitor set point field. ECTS assignment 133711 has been created to address the change in the next data sheet update. In addition, a note has been added to the instructor guide created for the new GPOM 3000 curriculum to train new apprentices to fill out working monitor set points in the monitor set point field using the "57/200" format. Attached, please find attachment 12 - "TD-4540-01-F01".</p> <p>III) The working monitor and monitor are the same device. TD-4540P-01, section 2.5.2.d.(1) explains that a successful lock up of the working monitor occurs when the device is tested for lockup with both pilots in control. This results in 2 separate lock-up tests. Once successful, the technician records "Y" for yes on form TD-4540-01-F02 "Regulator Station Maintenance Record". If the monitor does not lock up, the technician records "N" in the monitor lockup box and provides an explanation in the "comments or Record of Corrective Maintenance" section on the back side of the form. The only time the technician can record "Y" is if the monitor locks up during both lockup tests. If one of the 2 tests fail, the technician must record "N." An update to the maintenance procedure is not recommended. Attached, please find attachment 8 - TD 4540P-01.pdf and attachment 13 - TD-4540-01-F02.</p>	<p>Atch 11_Meter Records_CONF.pdf                  Atch 12_TD-4540-01-F01.pdf                  Atch 8_TD 4540P-01.pdf                  Atch 13_TD-4540-01-F02.docx</p>